

Exhibit D

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO,
et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,

Defendants.

§
§
§
§
§
§
§
§
§
§

Civil Action No. SA-21-CV-00844-XR

**CONSOLIDATED PLAINTIFFS' NOTICE OF INTENT TO TAKE
ORAL DEPOSITION OF CINDY SIEGEL**

TO: Cindy Siegel, by and through John M. Gore, Jones Day, 51 Louisiana Avenue, N.W., Washington, D.C. 20001 and to All Counsel of Record.

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, counsel for the Consolidated Plaintiffs will take the oral deposition of Cindy Siegel on February 28, 2023, at 8:30 am (CST) at the offices of Javier N. Maldonado & Associates, P.C., 1415 North Loop W., Suite 600, Houston, TX 77008 (Andromeda Conference Room on the Mezzanine Level). The deposition shall be recorded by stenographic means and may also be recorded by additional audiovisual means, and shall take place before a notary public or other person authorized by law to administer oaths. Plaintiffs reserve the right to utilize any videotaped deposition at trial in lieu of live testimony, or in addition to live testimony, and/or for any purpose permitted under the Federal Rules of Civil Procedure and Federal Rules of Evidence.

The Consolidated Plaintiffs further request that Ms. Siegel produce, at least two days in advance of the deposition, all documents, if any, that she reviewed in preparation for the deposition.

Dated: February 23, 2023

Respectfully submitted,

/s/ Nina Perales

Nina Perales

Julia R. Longoria

Fátima L. Menéndez

MEXICAN AMERICAN LEGAL DEFENSE AND
EDUCATIONAL FUND

110 Broadway, Suite 300

San Antonio, TX 78205

Telephone: (210) 224-5476

Facsimile: (210) 224-5382

nperales@maldef.org

jlongoria@maldef.org

fmenendez@maldef.org

Michael C. Keats*

Rebecca L. Martin*

Jason S. Kanterman*

Kevin Zhen*

FRIED, FRANK, HARRIS, SHRIVER
& JACOBSON LLP

One New York Plaza

New York, New York 10004

Telephone: (212) 859-8000

Facsimile: (212) 859-4000

michael.keats@friedfrank.com

rebecca.martin@friedfrank.com

jason.kanterman@friedfrank.com

kevin.zhen@friedfrank.com

*Counsel for Plaintiffs La Unión del Pueblo Entero,
Southwest Voter Registration Education Project,
Mexican American Bar Association of Texas, Texas
Hispanics Organized for Political Education, Jolt*

Action, William C. Velasquez Institute, FIEL Houston, Inc.

* Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2023, I provided an electronic copy of the foregoing Deposition Notice to counsel of record.

/s/ Nina Perales

Nina Perales